



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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JUL 10 2017

Ref: EPR-AR

Peter Brown, Historic Architecture Specialist
Montana State Historic Preservation Office
Box 201201
Helena, Montana 59620-1201

RE: NHPA Section 106 Consultation-- Finding of No Adverse Effects – Roundup Central School, Roundup, MT; Smithsonian #24ML0829

Dear Mr. Brown:

The Environmental Protection Agency awarded Snowy Mountain Development Corporation a Brownfields Revolving Loan Fund Grant that will be used to provide a loan to address building material contamination at Roundup Central School property located at 600 First Street W, Roundup, MT 59072 and the Roundup Central School Music Room Building located at 7th ST W, Roundup, MT, 59702. Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f, requires that federal agencies consider the effects of federal undertakings on historic properties and afford the State Historic Preservation Office (SHPO) a reasonable opportunity to comment with regard to such undertakings. I am writing to seek your concurrence that this undertaking, the proposed federally funded environmental cleanup, will not have an adverse effect on the Roundup Central School's National Register qualities and that the Music Room building is not eligible for listing on the National Historic Register.

In 2007, Roundup Central School was listed on the National Register of Historic Places with a period of significance from 1911-1959. The west wing of the original school (elementary school) was completed in 1911 and the east wing was added in 1913. The 1962 and 1974 additions are non-contributing and not eligible for the National Register. The Music Room Building also known as the Panther's Den was built in the 1920's and remodeled in the 1960's. A historic record form was completed for the Music Room building by Chere Jiusto of the Montana Preservation Alliance and it was determined that the building is not eligible for the National Historic Register. Please find enclosed for your review, the Montana Historic Record Form for the music room and information regarding areas with lead based paint in the historic elementary school building including a table, figures and photos.

The RLF subgrantee, Roundup Public School District, proposes to clean up the buildings prior to Musselshell County and Homewood acquiring the property and renovating the buildings. The 1962 addition will be abated for asbestos containing materials and LBP. The 1974 addition will be abated for asbestos containing materials. The music room contains asbestos and lead based paint. The asbestos containing material and lead based paint will be abated prior to demolition. All three of these buildings are not eligible for listing on the national register and therefore the cleanup of those three buildings will not affect a historic property or property eligible for listing on the National historic registry.

The Roundup Central School's original school building, also known as the elementary school, is listed on the National Register of Historic Places. Elevated lead paint concentrations were found on the ceilings, door components, trim, walls, and window components throughout the original school building and on the exterior bell tower. Mercury containing thermostats were also identified in the building. The scope of the federally funded cleanup for the original school building is dependent on an accredited lead remediation company's assessment of hazard risk and determination of remedial action needed to address LBP at the site to allow for the renovation. It is my understanding based on information provided from Snowy Mountain Development Corporation that the cleanup will include abatement of all lead based paint surfaces in the elementary school prior to the school transferring property ownership for redevelopment. A feasibility study was completed by High Plains Architects to explore general redevelopment options, however, this report doesn't specify the historic features of the building that will be maintained during cleanup and renovation. In the original school building, the lead based paint that the remediation company determines needs to be addressed prior to redevelopment will follow the Secretary of the Interior's Standards for the Treatment of Historic Properties. If it is determined that a building component will be removed from the original school building and replaced either as part of the lead based paint cleanup or redevelopment renovation, the Montana SHPO office will be consulted prior to any building component removal and replacement in the original school building.

Based on information provided to me from Snowy Mountain Development Corporation, the proposed cleanup work will not adversely modify, alter, destroy, or otherwise change historic elements of the building. This action will not remove any historic elements from the property, nor introduce elements that will diminish the property's historical significance. The original school building – Roundup Central School is listed on the National Register and the cleanup of the contaminated materials to facilitate the renovation will not adversely affect the school's historic national register qualities. If Snowy Mountain Development Corporation and their subgrantee's cleanup contractor determine that a different cleanup approach is necessary for the original school building, elementary school, that could modify, alter, destroy, or otherwise change historic elements of the building, they will stop work until the Montana SHPO office can be consulted.

Please respond within 30 days if you have any concerns regarding this letter of determination. If you have any questions, please feel free to contact me at 303-312-6314 or davis.gregory@epa.gov.

Sincerely,



Greg Davis
Brownfields Project Manager

Enclosures: Music Room Montana Historic Record Form
Photo Log Elementary School

cc: Kathie Bailey (Snowy Mountain Development Corporation)
Karen Sweeney (Snowy Mountain Development Corporation)